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ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

PRO SOUTH, INC.,

Debtor.

§
§
§
§
§

**CASE NO. 19-42427
Chapter 11**

**MOTION TO VOLUNTARILY DISMISS DEBTOR'S
CHAPTER 11 BANKRUPTCY CASE**

14-DAY NEGATIVE NOTICE – LBR 1007(b):

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.

No hearing will be conducted on this Motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading *WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE* shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

TO THE HONORABLE CHIEF UNITED STATES BANKRUPTCY JUDGE:

The Debtor, by its attorney, hereby requests that its Chapter 11 Bankruptcy Case be dismissed.

1. Debtor filed for Chapter 11 Bankruptcy on September 4, 2019.
2. The Debtor's secured creditor foreclosed on its property on March 5, 2020.
3. Debtor does not wish to continue with this bankruptcy case.

WHEREFORE, PREMISES CONSIDERED, Debtor prays for an order from the Court dismissing Debtor's Chapter 11 Bankruptcy Case proceeding and for such other and further relief to which it may show itself justly entitled.

DATED: June 18, 2020.

Respectfully Submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 18, 2020, a true and correct copy of the above and foregoing *Motion to Voluntarily Dismiss Debtor's Chapter 11 Bankruptcy* was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Label Matrix for local noticing

0540-4

Case 19-42427

Eastern District of Texas

Sherman

Thu Jun 18 16:29:57 CDT 2020

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Pro South, Inc.
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Wells Fargo Equipment Finance
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Comptroller of Public Accts
Rev Acctg Div/Bankruptcy Dept
PO BOX 13528
Austin, TX 78711

Fundbox
300 Montgomery St., Suite 900
San Francisco, CA 94104

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(u)Cash Capital Group, LLC
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(u)Commercial Credit Group, Inc.

(d)Corporate Billing
PO Box 1726
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(d)Enhanced Capital Mississippi Fund, LLC
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